

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

YEKEEN A. BELLO,

\*

Plaintiff,

\*

v.

\*

Civil Action No. AMD 03-CV-493

BANK OF AMERICA CORPORATION,

\*

Defendant.

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\* \* \* \* \*

**MOTION FOR SUMMARY JUDGMENT**

Defendant Bank of America Corporation (the “Bank”), through undersigned counsel and pursuant to Rule 56 of the Federal Rules of Civil Procedure, respectfully moves for an Order granting summary judgment in favor of the Bank and against Plaintiff in the above-captioned matter. The grounds in support of this Motion are fully set forth in the Memorandum in Support of this Motion with exhibits, filed herewith and incorporated herein by reference. Thus, the Court’s attention respectfully is directed to the Bank’s Memorandum in Support of its Motion.

WHEREFORE, the Bank respectfully requests that its Motion for Summary Judgment be granted in its entirety, that judgment be entered in favor of the Bank and against Plaintiff in the above-captioned matter, that the Bank be awarded its costs in this matter including reasonable attorneys’ fees, and that the Court grant the Bank such other and further relief as the Court deems just and proper.

Respectfully submitted,

/s/

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Douglas M. Topolski  
(Federal Bar No. 07844)

/s/

Elena D. Marcuss  
(Federal Bar No. 25547)  
McGuireWoods LLP  
Seven St. Paul Street, Suite 1000  
Baltimore, Maryland 21202

Attorneys for Defendant  
Bank of America Corporation

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 13th day of November 2003, a copy of the foregoing Motion for Summary Judgment, Memorandum in Support of its Motion for Summary Judgment with Exhibits, and proposed Order were filed electronically and served by first-class mail, postage prepaid, on Counsel for Plaintiff:

Fatai A. Suleman, Esquire  
Amorow & Kum, P.A.  
7676 New Hampshire Avenue, Suite 315  
Takoma Park, Maryland 20912.

/s/

Elena D. Marcuss